

FILED

NOV 24 2021

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAURENCE LINDSAY,

Defendant.

4:21CR00653 SEP/PLC

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

On or about December 8, 2020, in the St. Charles County, State of Missouri, within the Eastern District of Missouri,

**LAURENCE LINDSAY,**

the defendant herein, did knowingly and intentionally possess with the intent to distribute marijuana, Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of marijuana involved in the offense and directly attributable to the defendant is more than 100 kilograms, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B)(vii).

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an

offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count I, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violations set forth in Count I.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

SAYLER A. FLEMING  
United States Attorney

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FOREPERSON

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Assistant United States Attorney